



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MLM: BWB / ZA

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 8, 2011

via Email and ECF

Michael Hueston, Esq.
350 Fifth Avenue, Suite 4810
New York, NY 10118

Re: United States v. Kareem Ibrahim
Criminal Docket No. 07-543 (DLI)

Dear Counsel:

Pursuant to Brady v. Maryland, Giglio v. United States, and Title 18, United States Code, Section 3500, the government provides the following information:

In May 2007, the Joint Terrorism Task Force paid for airplane tickets for defendant Russell Defreitas that cost \$901.40, and airplane tickets for defendant Abdul Kadir that cost \$269.70, though those tickets were not used. In addition, in 2007, Steve Francis provided defendant Abdel Nur with \$200 and Muna Nur with \$50 through wire transfers.

In connection with the case, potential government witness Robert Addonizio has received two Federal Law Enforcement Federation Investigators Awards, a New York Federal Executive Board Teamwork Award, a National Intelligence Award and a New York City Detective Investigators Association Merit Award.

On or about March 16, 2011, potential government witness Steven Francis pled guilty to several traffic violations for failure to have proper vehicle registration and license plates and improper use of a turn signal. He received a fine of \$530, which he has now paid in full. Additionally, in approximately January 2011, Francis received a fine of \$750 for driving with a suspended license. Because this violation was directly related to Francis' relocation as a result of his work as a confidential informant, the FBI paid this fine.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH
UNITED STATES ATTORNEY

By: _____ /s/
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Berit W. Berger
Zainab Ahmad
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cc: Clerk of the Court (DLI)(via ECF)